

REMARKS

Favorable reconsideration and allowance of the present application are respectfully requested in view of the following remarks. Prior to the Reply, claims 1-10, 12 and 14-38 were pending. Claims 39-42 have been added through this Reply. Therefore, claims 1-10, 12 and 14-42 are now pending. Claims 2, 4, 16, 17 and 19-22 have been withdrawn from consideration. Claims 1 and 30 are independent.

§ 112, 2ND PARAGRAPH REJECTION

Claims 30-38 stand rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite. More specifically, it is noted that there is insufficient antecedent basis for the recitation “the multi-lens camera mode” in line 13. Claim 30 has been amended to address this issue. Applicants respectfully request that the Section 112, second paragraph rejection of claims 30-38 be withdrawn.

§ 102 REJECTION – YAMAGUCHI

Claims 30 and 31 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Yamaguchi (Translation of JP 64-007792). Applicants respectfully traverse.

For a Section 102 rejection to be proper, the cited reference must teach or suggest each and every claimed element. *See M.P.E.P. 2131; M.P.E.P. 706.02.* Thus, if the cited reference fails to teach or suggest one or more elements, then the rejection is improper and must be withdrawn.

In this instance, Yamaguchi fails to teach or suggest each and every claimed element. For example, independent claim 1 recites, in part, “wherein full image data from both the first and second image-capturing units are captured and stored while in the multi-lens camera mode.” Yamaguchi cannot be relied upon to teach or suggest at least this feature.

In Yamaguchi, the first and second cameras 12 and 15 are connected when stereoscopic image shooting is performed. When the cameras 12 and 15 are connected, the drive pulse f of the drive circuit 19 are supplied to both the first and second cameras 12 and 15, and as a result, the cameras 12 and 15 execute photographing operation. *See Yamaguchi translation, page 8, line 21 – page 9, line 2.*

Afterwards, the first camera 12 outputs image signal L and the second camera 15 output image signal R, and both signals R and L are guided to the switching circuit 20. *See Yamaguchi translation, page 9, lines 3–6.* As seen in Figure 2 of Yamaguchi, the first and second cameras 12 and 15 respectively output signals R and L to the switching circuit 20. The switching circuit 20 in turn outputs signal h to the signal processing circuit 21.

Yamaguchi clearly discloses that the switching circuit 20 **alternately switches** the project signals R and L **at every one field**. *See Yamaguchi translation, page 6, lines 13-17 and page 9, lines 6-8*. This is clearly shown in the lower part of Figure 3 of Yamaguchi. The first camera 12 outputs R signals R₁, R₂, R₃ and R₄ to the switching circuit 20. At the same time, the second camera 15 outputs L signals L₁, L₂, L₃ and L₄ also to the switching circuit 20.

However, the switching circuit outputs signals R₁, L₂, R₃ and L₄. In other words, as disclosed in Yamaguchi, the signals L₁, R₂, L₃ and R₄ are **not** output at all to be captured and stored when the camera in the stereoscopic mode. Clearly, Yamaguchi cannot be relied upon to teach or suggest the feature of wherein **full image data** from both the first and second image-capturing units are captured and stored while in the multi-lens camera mode.

Therefore, for at least this reason, independent claim 30 is distinguishable over Yamaguchi. Claim 31 depends from independent claim 30. Therefore, for at least the reasons stated with respect to claim 30, claim 31 is also distinguishable over Yamaguchi.

Applicants respectfully request that the rejection of claims 30 and 31 based on Yamaguchi be withdrawn.

§ 103 REJECTION – SUEMOTO, IWASHITA, VOCKENHUBER, YAMAGUCHI

Claims 1, 3, 5-7, 9, 10, 12, 14, 15 and 18 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Suemoto et al. (U.S. Patent No. 6,151,067), Iwashita et al. (U.S. Patent No. 4,148,072), Vockenhuber (U.S. Patent No. 4,148,072) and Yamaguchi. Applicants respectfully traverse.

For a Section 103 rejection to be proper, a *prima facie* case of obviousness must be established. *See M.P.E.P. 2142*. One requirement to establish *prima facie case* of obviousness is that the prior art references, when combined, must teach or suggest all claim limitations. *See M.P.E.P. 2142; M.P.E.P. 706.02(j)*. Thus, if the cited references fail to teach or suggest one or more elements, then the rejection is improper and must be withdrawn.

In this instance, independent claim 1 recites, in part “wherein full image data from both the first and second image-capturing units are captured and stored while in the multi-lens camera mode.” The Examiner alleges that Yamaguchi teaches the feature of the first and second image-capturing units cooperatively providing at least one of a panoramic imaging mode and a three-dimensional imaging mode when operatively connected in the multi-lens camera mode.

However, as clearly demonstrated above, Yamaguchi cannot be relied upon to teach or suggest the feature of wherein full image data from both the

first and second image-capturing units are captured and stored while in the multi-lens camera mode.

None of none of Suemoto, Iwashita and Vockenhuber can be relied upon to correct for at least this deficiency of Yamaguchi. Indeed, the Examiner admitted that none of Suemoto, Iwashita, and Vockenhuber can be relied upon to teach or suggest the feature of the first and second image-capturing units cooperatively providing at least one of a panoramic imaging mode and a three-dimensional imaging mode when operatively connected in the multi-lens camera mode. Then it logically follows that none of of Suemoto, Iwashita, and Vockenhuber can be relied upon to teach or suggest the feature of wherein full image data from both the first and second image-capturing units are captured and stored while in the multi-lens camera mode.

For at least the reasons stated above, independent claim 1 is distinguishable over the combination of Suemoto, Iwashita, Vockenhuber and Yamaguchi. Claims 3, 5-7, 9, 10, 12, 14, 15 and 18 depend from independent claim 1 directly or indirectly. Therefore, for at least the reasons stated with respect to independent claim, these dependent claims are also distinguishable over the combination of Suemoto, Iwashita, Vockenhuber and Yamaguchi.

Applicants respectfully request that the rejection of claims 1, 3, 5-7, 9, 10, 12, 14, 15 and 18 based on Suemoto, Iwashita, Vockenhuber and Yamaguchi be withdrawn.

§ 103 REJECTION – SUEMOTO, IWASHITA, VOCKENHUBER, YAMAGUCHI,
KANEKO

Claim 8 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Suemoto, Iwashita, Vockenhuber, Yamaguchi and Kaneko (U.S. Patent No. 4,920,371). Applicants respectfully traverse.

It is noted that claim 8 depends from claim 1, and it has been shown above that claim 1 is distinguishable over the combination of Suemoto, Iwashita, Vockenhuber and Yamaguchi. Kaneko has not been, and indeed cannot be, relied upon to correct for at least the above-noted deficiencies of Suemoto, Iwashita, Vockenhuber and Yamaguchi. Thus, claim 1 is distinguishable over the combination of Suemoto, Iwashita, Vockenhuber, Yamaguchi and Kaneko. For at least due to the dependency thereon, claim 8 is also distinguishable over the combination of Suemoto, Iwashita, Vockenhuber, Yamaguchi and Kaneko.

Applicants respectfully request that the rejection of claim 8 based on Suemoto, Iwashita, Vockenhuber, Yamaguchi and Kaneko be withdrawn.

§ 103 REJECTION – SUEMOTO, IWASHITA, VOCKENHUBER, YAMAGUCHI,
ISHIKAWA

Claims 23-26 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Suemoto, Iwashita, Vockenhuber, Yamaguchi and Ishikawa et al. (U.S. Patent No. 6,549,650). Applicants respectfully traverse.

It is noted that claims 23-26 depend from claim 1 directly or indirectly. It has also been shown above that claim 1 is distinguishable over the combination of Suemoto, Iwashita, Vockenhuber and Yamaguchi. Ishikawa has not been, and indeed cannot be, relied upon to correct for at least the above-noted deficiencies of Suemoto, Iwashita, Vockenhuber and Yamaguchi. Thus, claim 1 is distinguishable over the combination of Suemoto, Iwashita, Vockenhuber, Yamaguchi and Ishikawa. For at least due to the dependency thereon, claims 23-26 are also distinguishable over the combination of Suemoto, Iwashita, Vockenhuber, Yamaguchi and Ishikawa.

Applicants respectfully request that the rejection of claims 23-26 based on Suemoto, Iwashita, Vockenhuber, Yamaguchi and Ishikawa be withdrawn.

§ 103 REJECTION – SUEMOTO, IWASHITA, VOCKENHUBER, YAMAGUCHI,
FELLAGARA

Claims 27-29 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Suemoto, Iwashita, Vockenhuber, Yamaguchi and Fellegara et al. (U.S. Patent No. 6,441,854). Applicants respectfully traverse.

It is noted that claims 27-29 depend from claim 1 directly or indirectly. It has also been shown above that claim 1 is distinguishable over the combination of Suemoto, Iwashita, Vockenhuber and Yamaguchi. Fellegara has not been, and indeed cannot be, relied upon to correct for at least the above-noted deficiencies of Suemoto, Iwashita, Vockenhuber and Yamaguchi. Thus, claim 1 is distinguishable over the combination of Suemoto, Iwashita, Vockenhuber, Yamaguchi and Fellegara. For at least due to the dependency thereon, claims 27-29 are also distinguishable over the combination of Suemoto, Iwashita, Vockenhuber, Yamaguchi and Fellegara.

Applicants respectfully request that the rejection of claims 27-29 based on Suemoto, Iwashita, Vockenhuber, Yamaguchi and Fellegara be withdrawn.

§ 103 REJECTION –YAMAGUCHI, ISHIKAWA

Claims 32-35 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Yamaguchi and Ishikawa. Applicants respectfully traverse.

It is noted that claims 32-35 depend from independent claim 30 directly or indirectly. It has also been shown above that claim 30 is distinguishable over Yamaguchi. Ishikawa has not been, and indeed cannot be, relied upon to correct for at least the above-noted deficiencies of Yamaguchi. Thus, claim 30 is distinguishable over the combination of Yamaguchi and Ishikawa. For at least due to the dependency thereon, claims 32-35 are also distinguishable over the combination of Yamaguchi and Ishikawa.

Applicants respectfully request that the rejection of claims 32-35 are based on Yamaguchi and Ishikawa be withdrawn.

§ 103 REJECTION –YAMAGUCHI, FELLAGARA

Claims 36-38 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Yamaguchi and Fellegara. Applicants respectfully traverse.

It is noted that claims 36-38 depend from independent claim 30 directly or indirectly. It has also been shown above that claim 30 is distinguishable over Yamaguchi. Fellegara has not been, and indeed cannot be, relied upon to correct for at least the above-noted deficiencies of Yamaguchi. Thus, claim 30 is distinguishable over the combination of Yamaguchi and Fellegara. For at least due to the dependency thereon, claims 36-38 are also distinguishable over the combination of Yamaguchi and Fellegara.

Applicants respectfully request that the rejection of claims 36-38 are based on Yamaguchi and Fellegara be withdrawn.

NEW CLAIMS

Claims 39-42 have been added through this reply. All new claims are believed to be distinguishable over the cited references, individually or in any combination. For example, the new claims depend from independent claims 1 or 30 directly or indirectly. Therefore, for at least the reasons stated with respect to the independent claims, the newly added claims are also allowable. Applicants respectfully requests that the new claims be allowed.

CONCLUSION

All objections and rejections raised in the Final Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance. Should there be any outstanding matters that need to be resolved, the Examiner is respectfully requested to contact Hyung Sohn (Reg. No. 44,346), to conduct an interview in an effort to expedite prosecution in connection with the present application.

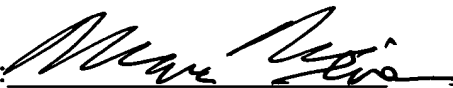
If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit


Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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